

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

EUCLIDES SOTO, LOUIS A. MARTINEZ,
JOSE RAMIREZ, CLEMENTE HERNANDEZ,
CESAR PIZARO, ELISON PENA,
JUAN COLON, JOSE ORTIZ, RAFAEL TORRES,
ANGEL BAEZ, ANTONIO MARTINEZ,
WILFREDO ORTIZ, EULOGIO ORTIZ,
MIRRAIN MIRANDA, RAFAEL MORENO,
NELSON ACEVEDO, and
RAMON RODRIQUEZ,

Plaintiffs,

v.

SHERMAN-FEINBERG CORPORATION,
FARNSWORTH FIBRE CORPORATION,
UNITED STEELWORKERS OF AMERICA,
LOCAL 421-U, and UNITED STEELWORKERS
OF AMERICA,

Defendants.

Civil Action No.
04-10892-JLT

**UNION DEFENDANTS' MOTION FOR LEAVE TO
SUBMIT A MEMORANDUM OF LAW IN EXCESS OF TWENTY PAGES**

The Defendants, United Steelworkers of America, Local 421-U and United Steelworkers of America (collectively, the "Unions"), hereby move for leave to submit a Memorandum of Law in excess of twenty (20) pages pursuant to Local Rule 7.1(B)(4).

In support of this Motion, the Unions state that the Memorandum of Law exceeds twenty pages because Plaintiffs have moved for an attachment of more than \$78 million, and the standard for granting such an attachment requires that Plaintiffs demonstrate "that there is a reasonable likelihood that the plaintiff will recover judgment in an amount equal to or greater than the amount of the

attachment.” Rodriguez v. Montalvo, 337 F.Supp.2d 212, 215 (D. Mass. 2004) (citing Mass. R. Civ. P. 4.1(c)). Accordingly, the Unions’ opposition must address all of the numerous claims raised by the Plaintiffs in the complaint, as well as their likelihood of recovering a judgment in the requested amount, and a brief in excess of twenty pages is necessary in order to fully address all of the relevant factual and legal arguments.

Respectfully submitted,

Dated: February 27, 2006

s/Harold L. Lichten
Harold L. Lichten, BBO # 549689
Alfred Gordon, BBO # 630456
Pyle, Rome, Lichten, Ehrenberg
& Liss-Riordan, P.C.
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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served by first class mail on the attorney of record for each party on February 27, 2006.

s/Harold L. Lichten
Harold L. Lichten